

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

In re REGIONS MORGAN KEEGAN SECURITIES, DERIVATIVE and ERISA LITIGATION

Case No.: 09-md-2009 SHM

This Document Relates To:

*In re Regions Morgan Keegan
Closed-End Fund Litigation,*

Master Case No: 2:07-cv-2830-SHM-dkv

Jones v. Morgan Keegan & Co., Inc.,
Case No. 2:10-cv-2248-SHM-dkv

Palmour v. Morgan Keegan & Co., Inc.,
Case No. 2:10-cv-2380-SHM-dkv

**MOTION OF THE RMK INVESTOR GROUP
FOR CONSOLIDATION, APPOINTMENT AS LEAD
PLAINTIFF, AND APPROVAL OF SELECTION OF COUNSEL**

PLEASE TAKE NOTICE that Class members the Lion Fund LP, Dr. J. Samir Sulieman, Jimmie L. Moon, and Larry Lattimore (collectively, the “RMK Investor Group”), by their counsel, hereby move this Court for an order: (1) consolidating the above-captioned, related actions; (2) appointing the RMK Investor Group as Lead Plaintiff; (3) approving the RMK Investor Group’s selection of Labaton Sucharow LLP as Lead Counsel and Branstetter, Stranch & Jennings, PLLC as Liaison Counsel; and (4) granting such other and further relief as the Court may deem just and proper. In support of this motion, the RMK Investor Group submits herewith a Memorandum of Law and the Declaration of J. Gerard Stranch, IV.

Dated: July 2, 2010

Respectfully submitted,

/s/ J. Gerard Stranch, IV

J. Gerard Stranch, IV, BPR# 023045
**BRANSTETTER, STRANCH &
JENNINGS, PLLC**
227 Second Avenue North
Nashville, TN 37201
Telephone: (615) 254-8801
Facsimile: (615) 250-3937
gstranch@branstetterlaw.com

Proposed Liaison Counsel for the Class

Christopher J. Keller
Alan I. Ellman
Stefanie J. Sundel
LABATON SUCHAROW LLP
140 Broadway
New York, NY 10005
Telephone: (212) 907-0700
Facsimile: (212) 818-0477
ckeller@labaton.com
aellman@labaton.com
ssundel@labaton.com

*Counsel for the RMK Investor Group
and Proposed Lead Counsel for the Class*

CERTIFICATE OF CONSULTATION

Lead Plaintiff Movants the Lion Fund LP, Dr. J. Samir Sulieman, Jimmie L. Moon, and Larry Lattimore (collectively, the “RMK Investor Group”) respectfully request exemption from Local Rule 7.2(a)(1)(B) requiring counsel for the parties to the action to consult prior to the filing of a motion. Pursuant to the Court’s June 2, 2010 Order Denying Plaintiff C. Fred Daniels’ Motion to Sever and Establishing Deadline for Motions to Serve as Lead Plaintiff (Dkt. #158), any interested party may file a motion seeking appointment as lead plaintiff by July 2, 1010. As of the filing of this motion, the RMK Investor Group cannot know all of the parties who may file lead plaintiff motions in this matter and, thus, respectfully request exemption from the consultation requirement.

Dated: July 2, 2010

Respectfully submitted,
/s/ J. Gerard Stranch, IV

J. Gerard Stranch, IV, BPR# 023045
**BRANSTETTER, STRANCH &
JENNINGS, PLLC**
227 Second Avenue North
Nashville, TN 37201
Telephone: (615) 254-8801
Facsimile: (615) 250-3937
gstranch@branstetterlaw.com

Proposed Liaison Counsel for the Class

Christopher J. Keller
Alan I. Ellman
Stefanie J. Sundel
LABATON SUCHAROW LLP
140 Broadway
New York, NY 10005
Telephone: (212) 907-0700
Facsimile: (212) 818-0477
ckeller@labaton.com
aellman@labaton.com
ssundel@labaton.com

*Counsel for the RMK Investor Group
and Proposed Lead Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2010, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following participating CM/ECF participants:

- **Adam Julien Gana**
agana@nbrlawfirm.com
- **Alan I. Ellman**
aellman@labaton.com
- **Albert C. Harvey**
HarveyA@thomasonlaw.com,
yearouts@thomasonlaw.com
- **Andrew Berke**
andy@berkeattys.com
- **Asa R. Danes**
asadanes@paulhastings.com
- **B. J. Wade**
bwade@gewwlaw.com,
smarshall@gewwlaw.com,
scrowe@gewwlaw.com
- **Beth A. Keller**
bkeller@faruqilaw.com
- **Charles H. Jones, Jr.**
fwatson@watsonburns.com
- **Christopher Marlborough**
cmarlborough@faruqilaw.com
- **D. Andrew Pietro**
pietroda@sullcrom.com
- **Dale H. Tuttle**
dtuttle@gewwlaw.com, fdavis@gewwlaw.com
- **David B. Tulchin**
tulchind@sullcrom.com
- **David E. Swarts**
swartsd@sullcrom.com
- **Derek W. Loeser**
dloeser@kellerrohrback.com,
kswope@kellerrohrback.com,
- eriley@kellerrohrback.com,
chopkins@kellerrohrback.com,
kpeterson@kellerrohrback.com
- **Edge Partners, Ltd.**
fwatson@watsonburns.com
- **Ellen M. Doyle**
edoyle@stemberfeinstein.com,
pewing@stemberfeinstein.com,
efeinstein@stemberfeinstein.com,
mdavidsonwelling@stemberfeinstein.com,
filings@stemberfeinstein.com
- **Emily C. Komlossy**
ekomlossy@faruqilaw.com
- **Emily Nicklin**
enicklin@kirkland.com
- **Ernest Koella**
nf@fallsveach.com
- **Eugene J. Podesta, Jr.**
gpodesta@bakerdonelson.com,
djenkins@bakerdonelson.com,
khughes@bakerdonelson.com
- **Frank L. Watson, III**
fwatson@watsonburns.com
- **Harold Naill Falls, Jr.**
nf@fallsveach.com
- **Ira Horowitz**
fwatson@watsonburns.com
- **J. Gerard Stranch, IV**
gstranch@branstetterlaw.com,
tharris@branstetterlaw.com,
cbatey@branstetterlaw.com
- **J. Timothy Francis**
francis@bham.rr.com

- **James G. Stranch, III**
jgs@branstetterlaw.com,
lcasey@branstetterlaw.com,
cbatey@branstetterlaw.com
- **Jeffrey B. Maletta**
jeffrey.maletta@klgates.com
- **Jeffrey R. Sonn**
jsonn@sonnerez.com
- **Jerome A. Broadhurst**
jbroadhurst@appersoncrump.com,
ptrantina@appersoncrump.com,
aburrow@appersoncrump.com,
jabcounsel@aol.com
- **John A. Cremer**
cmb@indylaw.com
- **John B. Veach, III**
tv@fallsveach.com
- **John J. Carey**
jcarey@careydanis.com
- **Judicial Panel on Multidistrict
Litigation**
panelmdl@jpml.uscourts.gov
- **Kenneth C. Johnston**
kjohnston@krel.com
- **Kevin C. Logue**
kevinlogue@paulhastings.com
- **Kristopher S. Ritter**
ritterk@kirkland.com
- **Leo Maurice Bearman , Jr**
lbearman@bakerdonelson.com
- **Marc Jay Bern**
mjbern@nbrlawfirm.com
- **Mark P. Chalos**
mchalos@lchb.com, korsland@lchb.com,
lrohling@lchb.com, bparker@lchb.com
- **Martin W. Zummach**
martin@sparkman-zummach.com
- **Matthew M. Curley**
mcurley@bassberry.com,
cwoosley@bassberry.com
- **Michael A. Brady**
mbrady@bassberry.com
- **Michael L. Dagley**
mdagley@bassberry.com
- **Nicole A. Baker**
nicole.baker@klgates.com,
klgateseservice@klgates.com
- **Peter H. Burke**
pburke@bhflegal.com,
cedwards@bhflegal.com
- **Peter S. Fruin**
pfruin@maynardcooper.com,
wwahlheim@maynardcooper.com,
tmauterer@maynardcooper.com,
jlee@maynardcooper.com
- **Randall K. Pulliam**
rpulliam@cauleybowman.com
- **Richard A. Lockridge**
ralockridge@locklaw.com
- **Scott L. Adkins**
sadkins@sonnerez.com
- **Scott T. Beall**
sbeall@bealllaw.com
- **Seymour Warren**
fwatson@watsonburns.com
- **Shepherd D. Tate**
state@bassberry.com,
lforbes@bassberry.com
- **Stefanie J. Sundel**
ssundel@labaton.com
- **Steven Lawrence Polk**
larry.polk@sutherland.com,
nichole.stearns@sutherland.com,
aaron.furniss@sutherland.com
- **Timothy A. Duffy**
tduffy@kirkland.com
- **W. Brantley Phillips, Jr.**
bphillips@bassberry.com

Furthermore, I hereby certify that I have mailed the document via the U.S. Postal Service to the following non-CM/ECF participants:

Paul J. Dobrowski
DOBROWSKI LLP
1010 Lamar, Ste. 1350
Houston, TX 77002

Richard M. Heimann
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
Embarcadero Center West
275 Battery St., 30th Floor
San Francisco, CA 94111-3339

Robert A. Izard
Jeff Nobel
Nancy A. Kulesa
IZARD NOBEL
29 South Main Street, Suite 215
West Hartford, CT 06107

/s/ J. Gerard Stranch, IV
J. Gerard Stranch, IV